

12/03/2020

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- EVREN ERYUREK -

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK  
----- X  
ULKU ROWE,

Plaintiff,

Case No.  
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X  
DATE: December 3, 2020  
TIME: 11:37 a.m.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION  
OF EVREN ERYUREK, held via Zoom, pursuant to  
Notice, before Hope Menaker, a Shorthand Reporter  
and Notary Public of the State of New York.

<p style="text-align: right;">Page 34</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 36</p> <p>1 - EVREN ERYUREK -</p> <p>2 Stevens?</p> <p>3 A. Brian was in and out, so he would</p> <p>4 travel a lot and I don't know that he had a</p> <p>5 permanent office. I think he had an office</p> <p>6 further down the hallway from us.</p> <p>7 Q. And were the other technical</p> <p>8 directors all located in California or were they</p> <p>9 in other locations?</p> <p>10 A. They were all over the place.</p> <p>11 Q. And do you recall some of the places</p> <p>12 where other technical directors were located?</p> <p>13 A. Texas, New York, Australia, Europe.</p> <p>14 I'm trying to remember if we had anything in</p> <p>15 Canada. We didn't have anything in Canada. And</p> <p>16 California.</p> <p>17 Q. And so were these staff meetings in</p> <p>18 person or were they held remotely through</p> <p>19 technology?</p> <p>20 A. Depended on the staff meetings.</p> <p>21 Sometimes in person; some largely virtual.</p> <p>22 Q. While we're talking about in person</p> <p>23 and virtual it reminds me: Going back to your</p> <p>24 other prior experience, in what roles did you work</p> <p>25 in Cloud-based technology?</p>
<p style="text-align: right;">Page 35</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 37</p> <p>1 - EVREN ERYUREK -</p> <p>2 A. In GE Healthcare, I was the Cloud's</p> <p>3 champion for the healthcare industry and I had</p> <p>4 deployed solutions on both issues; and in my last</p> <p>5 releases of what we called GE Health Cloud, it was</p> <p>6 on AWS and so I used both of them.</p> <p>7 Q. So how many years of experience</p> <p>8 had you had with Cloud-based technology at the</p> <p>9 time --</p> <p>10 MR. GAGE: Objection.</p> <p>11 Q. -- you joined Google?</p> <p>12 A. As an evangelist, probably eight</p> <p>13 years or so easily; and I had managed and deployed</p> <p>14 my solutions either on my own Cloud data centers</p> <p>15 or somebody else's Cloud data centers. So</p> <p>16 hands-on experience goes back to my GE</p> <p>17 Transportation days, so go from 2005 to now.</p> <p>18 Q. If we use Cloud versus on-prem, are</p> <p>19 those -- is that the right terms?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. At this point in time is more</p> <p>22 technology Cloud based or on-prem based.</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. On-prem based.</p> <p>25 Q. And do you know in the U.S., roughly</p>

<p style="text-align: right;">Page 118</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 120</p> <p>1                   - ROUGH DRAFT - EVREN ERYUREK</p> <p>2     understanding where the trends are, market trends</p> <p>3     are, and bringing it back to what our products and</p> <p>4     platforms need to be doing.</p> <p>5                   And another responsibility, we have</p> <p>6     to make sure that our revenue mark targets and so</p> <p>7     forth are projected accordingly and we deliver on</p> <p>8     our expected numbers.</p> <p>9           Q.     With respect to your role in PM, do</p> <p>10    you understand that you're evaluated against a</p> <p>11    leveling guideline?</p> <p>12           A.     Yes.</p> <p>13           Q.     And those engineering leveling</p> <p>14    guidelines that we looked at before, are those</p> <p>15    also relevant to the PM role?</p> <p>16           A.     Yes.</p> <p>17           MS. GREENE: Okay, I'm just about</p> <p>18    done. What I want to do is take a short</p> <p>19    break and then we'll come back and finish up.</p> <p>20           THE WITNESS: So what -- how long do</p> <p>21    we need?</p> <p>22           MS. GREENE: Let's take ten minutes.</p> <p>23           MR. GAGE: Okay, we'll come back ten</p> <p>24    minutes after the hour.</p> <p>25           THE WITNESS: All right.</p>
<p style="text-align: right;">Page 119</p> <p>1                   - ROUGH DRAFT - EVREN ERYUREK</p> <p>2     initiatives?</p> <p>3           MR. GAGE: Objection.</p> <p>4           A.     Yes.</p> <p>5           Q.     Does the PM role involve</p> <p>6     corroborating across functional and product area</p> <p>7     boundaries?</p> <p>8           MR. GAGE: Objection.</p> <p>9           A.     Yes.</p> <p>10          Q.     Does the PM role involve working with</p> <p>11    broader Google engineering and research teams?</p> <p>12          MR. GAGE: Objection.</p> <p>13          A.     Yes.</p> <p>14          Q.     In what ways is the PM role similar</p> <p>15    to the role that you were performing in OCTO?</p> <p>16          A.     Customer sponsorship evangelization,</p> <p>17    working with other teams and so forth, but nothing</p> <p>18    to do with the -- how we build a product, how we</p> <p>19    define a strategy, how we execute that strategy.</p> <p>20          Q.     And so the next question is: How is</p> <p>21    the PM role different from the role you were</p> <p>22    performing in OCTO?</p> <p>23          A.     We are responsible for defining</p> <p>24    long-term roadmaps, executing them incrementally</p> <p>25    on quarterly, whatever short term, and the</p>	<p style="text-align: right;">Page 121</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>